

JEFFREY I. PITEGOFF, ESQ.
Nevada Bar No. 005458
PITEGOFF LAW OFFICE INC.
Las Vegas, Nevada 89149
Telephone No. (702) 808-7976
jpitegoff@yandex.com
Attorney for Defendants

UNITED STATES DISTRICT COURT
STATE OF NEVADA

THOMAS W. FINN, an individual,

Plaintiff,

vs.

CITY OF BOULDER CITY, a political
subdivision of the STATE OF NEVADA;
DAVE OLSEN, individually and in his
capacity as City Attorney of Boulder City;
ROGER TOBLER, individually and in his
capacity as Mayor of Boulder City; CAM
WALKER, ROD WOODBURY, PEGGY
LEAVITT, and DUNCAN MCCOY,
individually and in their capacities as City
Councilmembers,

Defendants.

CASE NO: 2:14-cv-01835-JAD-GWF

Motion to Substitute Counsel

Defendants (hereinafter "Boulder"), by and through its attorney, Jeffrey I. Pitegoff, Esq.
of the law firm of PITEGOFF LAW OFFICE INC. move this Honorable Court for an Order
granting this request to Substitute as Counsel.

I.

MEMORANDUM IN SUPPORT OF SUBSTITUTION

Attached hereto as Exhibit A is a Substitution of Counsel accepting the change in
representation on behalf of Boulder sought herein.

CONCLUSION

For the reasons expressed above, it is respectfully requested that this Honorable Court
issue an Order granting the requested substitution.


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DATED this 14th day of February, 2018.

PITEGOFF LAW OFFICE INC.

/s/ Jeffrey I. Pitegoff
JEFFREY I. PITEGOFF, ESQ.
Nevada Bar No. 005458
7765 W. Rosada Way
Las Vegas, NV 89149
Tel: 702-808-7976
Attorney for Defendants

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE
DATED: February 15, 2018

1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP 5(b), I certify that I am an employee of PITEGOFF LAW OFFICE
3 INC. and that on this day, I personally served a true and correct copy of the attached by:

4 ☐ U.S. Mail

5 ☒ CM-ECF Electronic filing system

6 ☐ Facsimile Transmission

7 ☐ Personal Service

8 Addressed to the following:

9 FLANAGAN, LTD.
10 Sean P. Flanagan
11 Nevada Bar Number 5304
12 7251 W. Lake Mead Blvd., Suite 300
13 Las Vegas, Nevada 89128
14 *Attorney for Plaintiff*

15 Dated this 14th day of February, 2018.

16 /s/ Jeffrey Pitegoff
17 An Employee of PITEGOFF LAW OFFICE INC.

1 JEFFREY I. PITEGOFF, ESQ.
2 Nevada Bar No. 05458
3 PITEGOFF LAW OFFICE
4 7765 W. Rosada Way
5 Las Vegas, Nevada 89149
6 Telephone No. (702) 808-7976
7 jpitegoff@vandex.com

8 *Attorneys for Defendant*

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UNITED STATES DISTRICT COURT
STATE OF NEVADA

THOMAS W. FINN, an individual,
Plaintiff,

vs.

CITY OF BOULDER CITY, a political
subdivision of the STATE OF NEVADA;
DAVE OLSEN, individually and in his
capacity as City Attorney of Boulder City;
ROGER TOBLER, individually and in his
capacity as Mayor of Boulder City; CAM
WALKER, ROD WOODBURY, PEGGY
LEAVITT, and DUNCAN MCCOY,
individually and in their capacities as City
Councilmembers,

Defendants.

CASE NO: 2:14-cv-01835-JAD-GWF

SUBSTITUTION OF COUNSEL

Jeffrey I. Pitegoff, Esq. of PITEGOFF LAW OFFICE, is hereby substituted in as counsel
for Defendants, CITY OF BOULDER CITY, DAVE OLSEN, ROGER TOBLER, CAM
WALKER, ROD WOODBURY, PEGGY LEAVITT and DUNCAN MCCOY in the above-
entitled action, in place of MORRIS, SULLIVAN, LEMKUL & PITEGOFF.

All future correspondence, notices, and pleadings concerning CITY OF BOULDER
CITY, DAVE OLSEN, ROGER TOBLER, CAM WALKER, ROD WOODBURY, PEGGY
LEAVITT and DUNCAN MCCOY in the above-entitled action are to be directed to Jeffrey I.

1 Pitegoff, Esq. of PITEGOFF LAW OFFICE at 7765 W. Rosada Way, Las Vegas, NV 89149;
2 Telephone: (702) 808-7976.

3 DATED this 14th day of February, 2018.

4 **PITEGOFF LAW OFFICE**

5
6 JEFFREY I. PITEGOFF, ESQ.
7 Nevada Bar No. 005058
8 7765 W. Rosada Way
9 Las Vegas, Nevada 89149

10 Christopher A. Turtzo, Esq. of MORRIS, SULLIVAN, LEMKUL & PITEGOFF hereby
11 agree and consent to the substitution of Jeffrey I. Pitegoff, Esq., as attorney of record for
12 Defendants, CITY OF BOULDER CITY, DAVE OLSEN, ROGER TOBLER, CAM WALKER,
13 ROD WOODBURY, PEGGY LEAVITT and DUNCAN MCCOY in the above-entitled action.

14 DATED this 10 day of January, 2018.

15 **MORRIS, SULLIVAN, LEMKUL &
16 PITEGOFF**

17 CHRISTOPHER A. TURTZO, ESQ.
18 Nevada Bar No. 010253
19 3770 Howard Hughes Parkway, Suite 170
20 Las Vegas, NV 89169

21 CITY OF BOULDER CITY, DAVE OLSEN, ROGER TOBLER, CAM WALKER, ROD
22 WOODBURY, PEGGY LEAVITT and DUNCAN MCCOY hereby accept and consent to the
23 substitution of Jeffrey I. Pitegoff, Esq. of PITEGOFF LAW OFFICE, as attorney of record for
24 Defendants, CITY OF BOULDER CITY, DAVE OLSEN, ROGER TOBLER, CAM WALKER,
25 ROD WOODBURY, PEGGY LEAVITT and DUNCAN MCCOY in the above-entitled action.

26 DATED this 29th day of January, 2018.

27 **CITY OF BOULDER CITY**

28 By: Shirley Morris
Its: Acting City Attorney

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CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that service of the foregoing: SUBSTITUTION OF

COUNSEL was made this ____ day of January, 2018, by:

[] BY U.S. MAIL: by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

[] BY FACSIMILE: by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document.

[] BY PERSONAL SERVICE: by causing personal delivery by an employee of MORRIS SULLIVAN LEMKUL & PITTEGOFF of the document(s) listed above to the person(s) at the address (es) set forth below.

[X] BY ELECTRONIC SERVICE: by transmitting via the Court's electronic CM-ECF filing services the document(s) listed above to the Counsel set forth below on this date pursuant to FRCP Rules.

Sean Flanagan, Esq.
FLANAGAN, LTD.
10223 Rarity Avenue
Las Vegas, NV 89135
Attorney for Plaintiffs

An Employee of PITTEGOFF LAW OFFICE